

EXHIBIT 2

From: Thad Kodish
Sent: Friday, February 16, 2024 3:23 PM
To: Jason Wietholter
Cc: rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater; Jared Hartzman; tom@gillamsmithlaw.com; melissa@gillamsmithlaw.com; headwater@raklaw.com
Subject: RE: Headwater v. Samsung 2:22-cv-422 (E.D.Tex) - Raleigh Qualcomm Employment Records

Jason,

Headwater waiting until a half hour before the meet and confer to advise of unavailability, after 15 days of ignoring our correspondence on the authorization issue, is gamesmanship and amounts to a refusal to meet & confer. Your non-committal statement that you are "in the process of obtaining the authorization," in view of the extent of non-responsiveness Samsung has endured from Headwater in this case, is a transparent attempt to run out the clock. We will file a motion to compel today and note that you oppose.

Regards,

Thad

Thad Kodish :: Managing Principal :: Fish & Richardson P.C.
404 724 2792 direct :: 404 849 3536 mobile :: tkodish@fr.com

From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Friday, February 16, 2024 2:24 PM
To: Josh Carrigan <carrigan@fr.com>
Cc: rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>; Jared Hartzman <hartzman@fr.com>; tom@gillamsmithlaw.com; melissa@gillamsmithlaw.com; headwater@raklaw.com
Subject: Re: Headwater v. Samsung 2:22-cv-422 (E.D.Tex) - Raleigh Qualcomm Employment Records

Counsel,

Our lead counsel is not available today at the proposed time. We are in the process of obtaining the authorization and will revert.

Regards,

Jason Wietholter

Russ, August & Kabat

12424 Wilshire Boulevard, 12th Floor | Los Angeles, California 90025
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On Feb 14, 2024, at 1:08 PM, Josh Carrigan <carrigan@fr.com> wrote:

Counsel,

Given Headwater's refusal to respond on the previous *three occasions*, Samsung intends to open the line for a lead and local meet and confer on this issue on **Friday, February 16 at 3 PM**. Dial-in information is located below. If Headwater refuses to join the call or otherwise refuses to provide the signed consent form from Dr. Raleigh, Samsung will immediately move to compel.

888-706-0584,,5057225#

Regards,

Joshua P Carrigan :: Fish & Richardson P.C. :: 202 626 7701

From: Jared Hartzman <hartzman@fr.com>

Sent: Monday, February 12, 2024 4:55 PM

To: Jason Wietholter <jwietholter@raklaw.com>

Cc: rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>

Subject: RE: Headwater v. Samsung 2:22-cv-422 (E.D.Tex) - Raleigh Qualcomm Employment Records

Counsel,

I write to follow up, for the 3rd time, on Dr. Raleigh's authorization to Qualcomm to disclose the employment records sought in Samsung's subpoena. Please immediately have Dr. Raleigh sign the consent form or confirm that Dr. Raleigh is refusing to authorize Qualcomm to release Dr. Raleigh's employment information.

Regards,

Jared Hartzman :: Principal :: Fish & Richardson P.C.

202 626 7754 direct :: 845 323 7563 mobile :: hartzman@fr.com

[fr.com](#) :: [Bio](#) :: [LinkedIn](#) :: [Twitter](#)

From: Jared Hartzman <hartzman@fr.com>

Sent: Friday, February 9, 2024 4:53 PM

To: Jason Wietholter <jwietholter@raklaw.com>

Cc: rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>

Subject: RE: Headwater v. Samsung 2:22-cv-422 (E.D.Tex) - Raleigh Qualcomm Employment Records

Counsel,

I write to follow up on my below email regarding Dr. Raleigh's authorization to Qualcomm to disclose the employment records sought in Samsung's subpoena. Please immediately have Dr. Raleigh sign the consent form or confirm that Dr. Raleigh is refusing to authorize Qualcomm to release Dr. Raleigh's employment information—information that is clearly relevant to issues in this case. Dr. Raleigh's

continued delay in providing such consent continues to prejudice Samsung, and Samsung thus reserves all rights.

Regards,

Jared Hartzman :: Principal :: Fish & Richardson P.C.
202 626 7754 direct :: 845 323 7563 mobile :: hartzman@fr.com
[fr.com](#) :: [Bio](#) :: [LinkedIn](#) :: [Twitter](#)

From: Jared Hartzman <hartzman@fr.com>
Sent: Tuesday, February 6, 2024 8:11 PM
To: Jason Wietholter <jwietholter@raklaw.com>
Cc: rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>
Subject: RE: Headwater v. Samsung 2:22-cv-422 (E.D.Tex) - Raleigh Qualcomm Employment Records

Jason,

Unfortunately, we had prepared the notice on December 20, 2023 but the email inadvertently failed to go out. Attached please find Samsung's subpoena to Qualcomm along with an updated notice reflecting today's date.

However, I note that Headwater has been aware of Samsung's subpoena to Qualcomm, and all of Samsung's requests for production, at least since receiving Samsung's attached January 23, 2024 email providing Qualcomm's responses and objections to Samsung's subpoena.

As I mentioned in my email from February 1, 2024, under California employment law, Dr. Raleigh needs to authorize Qualcomm to disclose the requested employment records to Samsung. Please confirm that you will have Dr. Raleigh sign and return a final PDF of the authorization form provided in my prior email to Samsung this week, such that it can be provided to Qualcomm.

Regards,

Jared Hartzman :: Principal :: Fish & Richardson P.C.
202 626 7754 direct :: 845 323 7563 mobile :: hartzman@fr.com
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From: Jason Wietholter <jwietholter@raklaw.com>
Sent: Tuesday, February 6, 2024 7:29 PM
To: Jared Hartzman <hartzman@fr.com>
Cc: rak_headwater@raklaw.com; [SERVICE FR] Samsung-Headwater <SERVICEFRSamsung-Headwater@fr.com>
Subject: Re: Headwater v. Samsung 2:22-cv-422 (E.D.Tex) - Raleigh Qualcomm Employment Records

[This email originated outside of F&R.]

Counsel,

Headwater was not provided with notice or a copy of Samsung's subpoena to Qualcomm before it was served on Qualcomm as required by FRCP 45. Please provide Headwater with notice and a copy of the subpoena in accordance with Rule 45.

Regards,

Jason Wietholter

Russ, August & Kabat

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On Feb 1, 2024, at 8:00 PM, Jared Hartzman <hartzman@fr.com> wrote:

Counsel,

As you are aware, Samsung subpoenaed Qualcomm on December 20, 2023. Pursuant to that subpoena, Samsung sought certain employment records for Greg Raleigh. Under California employment law, Dr. Raleigh needs to authorize Qualcomm to disclose such records to Samsung. Attached is an authorization form provided by Qualcomm to be filled out by Dr. Raleigh. Please confirm that you will have Dr. Raleigh sign and return a final PDF of this form to Samsung by no later than Tuesday, February 6th, such that it can be provided to Qualcomm.

Regards,

Jared Hartzman :: Principal :: Fish & Richardson P.C.

202 626 7754 direct :: 845 323 7563 mobile :: hartzman@fr.com

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*****<AUTHORIZATION FOR
RELEASE OF EMPLOYMENT RECORDS.docx>

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